

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, *et al.*,

Debtors.¹

Chapter 11

Case No. 23-90147 (DRJ)

Jointly Administered

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
WITNESS AND EXHIBIT LIST**

The Official Committee of Unsecured Creditors in the above-captioned cases (the “Committee”), hereby submits the following *Witness and Exhibit List* (the “Witness and Exhibit List”) with respect to the hearing scheduled for May 25, 2023 at 1:00 p.m. (Prevailing Central Time) (the “Hearing”) in the above-captioned bankruptcy cases (the “Cases”), pending before the Honorable David R. Jones, United States Bankruptcy Judge, 515 Rusk Street, Houston, Texas 77002.

The Committee designates the following witnesses and exhibits that may be offered at the Hearing.

WITNESSES

1. Craig A. Barbarosh, Independent Director;
2. Lawrence Perkins, Independent Director;
3. Any witness listed, offered, or called by any other party;
4. Any witness necessary to authenticate a document; and
5. Any witness required for rebuttal or impeachment.

¹ A complete list of each of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kcellc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company’s principal place of business and the Debtors’ service address in these Chapter 11 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

EXHIBITS

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
A.	Bylaws				
B.	Articles of Incorporation				
C.	Amended & Restated Shareholder Agreement				
D.	Independent Director Service Agreement – Craig A. Barbarosh				
E.	Independent Director Service Agreement – Lawrence Perkins				
F.	Prepetition Shareholder Resolution				
G.	Pre-Petition Special Transaction Committee Resolution				
H.	Post-Petition Special Transaction Committee Resolution				
I.	Any pleading on file in these cases				
J.	Any exhibits listed, designated, or offered by any other party				
K.	Any exhibits necessary for rebuttal				

The Committee reserves the right to modify, amend or supplement this Witness and Exhibit List at any time prior to the Hearing. The Committee reserves the right to ask the Court to take judicial notice of pleadings, orders, transcripts, and/or other documents filed in or in connection with these Cases, and to offer rebuttal exhibits. Designation of any exhibit above does not waive any objections the Committee may have to any exhibit listed on any other party's exhibit list.

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Dated: May 24, 2023
Dallas, Texas

MCDERMOTT WILL & EMERY LLP

/s/ Charles R. Gibbs

Charles R. Gibbs (Texas Bar No. 7846300)

Marcus A. Helt (Texas Bar No. 24052187)

Jane A. Gerber (Texas Bar No. 24092416)

2501 North Harwood Street, Suite 1900

Dallas, Texas 75201-1664

Telephone: (214) 295-8000

Facsimile: (972) 232-3098

Email: crgibbs@mwe.com

mhelt@mwe.com

jagerber@mwe.com

-and-

Maris J. Kandestin (admitted *pro hac vice*)

The Nemours Building

1007 North Orange Street, 10th Floor

Wilmington, Delaware 19801

Telephone: (302) 485-3900

Facsimile: (302) 351-8711

Email: mkandestin@mwe.com

*Proposed Counsel to the Official Committee of
Unsecured Creditors*

CERTIFICATE OF SERVICE

I certify that on May 24, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Gibbs

Charles R. Gibbs